

## **Remarks**

The above Amendments and these Remarks are in reply to the Office Action mailed March 10, 2003.

No fee is due for the addition of any new claims.

Applicants respectfully submit that the claims are in condition for allowance and request entry of the present Response B. It is respectfully submitted that the new reference and Official Notice suffer from similar deficiencies identified by Applicants in Response A, submitted in response to the Office Action dated September 17, 2002.

The drawings filed on April 30, 1999 were objected to by the Examiner. FIGS. 10 and 11 illustrating each of the features in Claims 1-4 have been submitted. No new matter is added by the addition of these drawings.

Claims 1-4 were pending in the Application prior to the outstanding Office Action. In the Office Action, the Examiner rejected Claims 1-4 under 35 U.S.C. §103(a) as being unpatentable over *Craddock, et al.* (U.S. 6,351,771). Reconsideration of the rejections is requested.

The present response amends the specification to include reference numerals for the features shown in FIG. 10 and FIG. 11. No new matter is added by the amendments to the specification.

### **I. SUMMARY OF EXAMINER'S OBJECTIONS**

The drawings were objected to under 37 CFR 1.83(a) for not showing every feature of the invention specified in the claims.

### **II. SUMMARY OF EXAMINER'S REJECTIONS**

Claims 1 -4 were rejected under 35 U.S.C. 103(a) as being unpatentable over *Craddock, et al.* (U.S. Pat. No. 6,351,771).

### III. RESPONSE TO OBJECTIONS

Additional drawings (FIG. 10 and FIG. 11) have been submitted at the Examiner's request. Each of the features of Claims 1-4 is shown in FIG. 10 and FIG. 11. Withdrawal of the Examiner's objection is respectfully requested. No new matter has been added by the addition of these drawings. The features of the drawings can be found in the claims and the specification.

### IV. RESPONSE TO REJECTIONS

#### A. Rejection of Claims 1-4 under 35 U.S.C. § 103(a)

Claims 1-4 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Craddock*. It is respectfully submitted that *Craddock* fails to teach or suggest each of the limitations of Claims 1-4. It is further submitted that the Official Notice taken by the Examiner fails to remedy any of the deficiencies of *Craddock*.

#### 1. Claims 1 and 3

*Craddock* discloses a distributed service network with region servers including "a data stream conversion system comprising set 44 of transducers 46 and a transducer matrix switch 48 to convert data streams between various formats, protocols and standards as required." *Craddock*, col. 3, lines 52-56. Accordingly, *Craddock* is directed to a network for converting data streams between various formats. *Craddock*, however, fails to teach or suggest each of the limitations of Claims 1-4.

*Craddock* fails to teach or suggest "generating an image of a pre-determined rendition of the set of contents" as recited in Claim 1 or "an image generator configured to generate an image of a pre-determined rendition of the set of contents" as recited in Claim 3. *Craddock* teaches a network that allows "users to access telecommunications and other external services from any access point in the network." *Craddock*,

col. 2, lines 50-53. "These services are provided transparently to the user and are also provided transparently to the service provider." *Id.*, col. 2, lines 53-55. Accordingly, the system of *Craddock* provides heterogeneous clients with different requirements and parameters access to telecommunications and other external services.

There is no mention or suggestion, however, of generating "an image of a pre-determined rendition of the set of contents," as recited in Claims 1 and 3. Significantly, *Craddock* is directed to providing data format conversion such that service providers and users have transparent access to services over the disclosed network. *Craddock* teaches blind conversion of data formats based merely upon a particular user's requirements, etc. In no way, however, does data format conversion as taught by *Craddock* or otherwise suggest generating "an image of a pre-determined rendition of the set of contents," as recited in Claims 1 and 3. This limitation is significant because a pre-determined rendition allows a user or service provider to identify sections in the content such that the re-formatted rendition can include only those sections identified by the user. *Craddock* is only concerned with data format conversion based on a client's requirements, not with providing the client or service provider the opportunity to select portions of content for re-formatting by generating "an image of a pre-determined rendition of the set of contents," as recited in Claims 1 and 3.

*Craddock* also fails to teach or suggest "re-formatting the identified section to generate a new rendition including the identified section, wherein the new rendition is formatted based upon a characteristic of the specific class of devices and the preference of the user," as recited in Claim 1 and "a section manipulator configured to re-format the identified section to generate a new rendition including the identified section, wherein the new rendition is formatted based upon a characteristic of the specific class of devices and the preference of the user," as recited in Claim 3.

*Craddock* simply discloses data transformation. For example, *Craddock* recites that "[t]ransducer matrix switch 48 arranges, configures and/or connects one or more transducers 46 in set 44, as necessary,

to convert between the data formats (types and/or protocols) employed by client 40 and the data formats employed by the service being accessed.” *Craddock*, col. 6, lines 45-49. There is no discussion or suggestion within *Craddock* of generating an image and identifying a section in the image, such that what is transformed is “the identified section to generate a new rendition including the identified section,” as recited in Claims 1 and 3. *Craddock* merely discloses a network, such that “[o]nce a full connection is established with a region server 24, the user has complete access to all services through network 14 which the user is authorized to access, as determined from the user’s personal agent or other user profile information, essentially independent of the client 40 he has employed to connect to the network and all authorized data access requests are served by network 14 to client 40.” *Id.*, col. 6, lines 24-31. Thus, the network of *Craddock* becomes transparent and simply transforms the data in from one format to data out in another format. The data out is simply the data in, adapted for a specific client. This data in/data out format does not suggest “re-formatting the identified section to generate a new rendition including the identified section, wherein the new rendition is formatted based upon a characteristic of the specific class of devices and the preference of the user.”

In addition to *Craddock* not teaching the above limitations, the Examiner acknowledges that *Craddock* does not teach or suggest “identifying a section in the contents based on a preference of a user” as recited in Claim 1 or “a section identifier configured to identify a section in the contents based on a preference of a user” as recited in Claim 3. Instead, the Examiner takes Official Notice that these limitations are well-known. *Office Action*, page 2, para. 4. Specifically, the Examiner states that the example of “detecting user selection of link in a web page was notoriously well known in the art at the time of [sic] the invention was made.” *Id.* The Examiner concludes that it would have been obvious “to modify operation of a system that capable of formatting information in accordance with client device limitation and user profile

as taught by Craddock to allow its user select prefer [sic] content to be presented to the client.” *Id.*, page 3, para. 1. Applicants respectfully disagree with this characterization.

As discussed in Applicants’ previous Response A, the selection of hyperlinks provides new content to a user. Hyperlinks can provide a pointer to a new address or location of content such as a web page appearing at an internet address. For example, if a user selects a hyperlink, a new web page can be presented as a user navigates to a new address. If the selection of hyperlinks is combined with *Craddock*, new content generated by the selection would be presented to the user in accordance with the user’s requirements. Accordingly, the reformatted data would be a new Web page, not a “new rendition including the identified section,” as recited in Claims 1 and 3 (*emphasis added*). A new Web page pointed to by the hyperlink would be presented rather than a new rendition including the identified hyperlink. Thus, even if the Examiner’s Official Notice is combined with *Craddock*, the combination fails to teach or suggest each of the limitations of Claims 1 and 3.

It is further submitted that *Craddock* teaches away from Applicants’ claimed invention. The network taught by *Craddock* is structured so that services are provided “transparently to the user and are also provided transparently to the service provider.” *Id.*, col. 2, lines 53-55. Accordingly, “conversions are automatically performed by a data conversion system and/or adapters in the network.” *Id.*, col. 2, 59-61. *Craddock* states that “the author of the HTML document does not need to alter the document to allow the user to access it via a PCS telephone.” *Craddock*, col. 13, lines 66-67. Having as its goal transparent, automatic conversions, *Craddock* teaches away from generating “a pre-determined rendition of the set of contents,” identifying “a section in the contents,” and re-formatting “the identified section,” as recited in Claims 1 and 3. Rather than re-formatting sections identified by a user as taught and claimed by Applicants, *Craddock* teaches an automatic, transparent conversion of the data input to the network.

Additionally, there is no motivation or suggestion to combine *Craddock* with the Official Notice to come up with the limitations of Claims 1 and 3. As discussed, *Craddock* discloses a network capable of providing automatic conversion of data formats that is transparent to both the user and service provider. With a goal of automatic and transparent conversion, *Craddock* contains no motivation or suggestion to combine its network with the substance of the Official Notice which provides for identifying sections of content. There is no motivation or suggestion to combine *Craddock* with anything that would interfere with the automatic, transparent conversion.

Since *Craddock* fails to teach or suggest each of the limitations of Claims 1 and 3, Claims 1 and 3 cannot be obvious over *Craddock*. It is further submitted that *Craddock* and the Examiner's Official Notice, either alone or in combination, fail to teach or suggest each of the limitations of Claims 1 and 3, and therefore, cannot render Claims 1 and 3 obvious. Additionally, it is submitted that no motivation exists to combine *Craddock* with the Official Notice, and further that *Craddock* teaches away from Claims 1 and 3. Accordingly, withdrawal of the Examiner's rejection of Claims 1 and 3 under 35 U.S.C. § 103(a) as being unpatentable over *Craddock* is requested.

## **2. Claims 2 and 4**

Claims 2 and 4 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Craddock*. The Examiner stated that "Craddock discloses the region server select a group of user or client devices from their registration (Col. 5, lines 24-37), i.e., selecting the user from the group of an end-user viewing the new rendition and the provider of the set of contents." *Office Action*, page 3, para. 5. It is respectfully submitted that *Craddock* does not in fact teach or suggest the limitations of Claims 2 and 4.

Claims 2 and 4 recite that "the user is selected from the group of an end-user viewing the new rendition and the provider of the set of contents." The Examiner's citation of *Craddock* appears to draw

a distinction between a user and a client device as described by *Craddock*. *Craddock* discloses a “user profile” containing “user preferences for various possible client devices.” Accordingly, the user accesses the network through one of these client devices. The client device and the user are both client side end users, not service providers. Therefore, *Craddock* does not teach or suggest “the user is selected from the group of an end-user viewing the new rendition and the provider of the set of contents,” as recited in Claims 2 and 4.

Furthermore, Claims 2 and 4 each depend on independent Claims 1 and 3 respectively, and are therefore at least patentable for the reasons mentioned above.

Since *Craddock* fails to teach or suggest each of the limitations of Claims 2 and 4, Claims 2 and 4 cannot be obvious over *Craddock*. It is further submitted that *Craddock* and the Examiner’s Official Notice fail to render Claims 2 and 4 obvious, either alone or in combination. Accordingly, withdrawal of the Examiner’s rejection of Claims 2 and 4 under 35 U.S.C. § 103(a) as being unpatentable over *Craddock* is requested.

V. **RESPONSE TO EXAMINER’S COMMENTS IN PARAGRAPH 7 OF THE OFFICE ACTION**

In paragraph 7 of the Office Action, the Examiner stated that “[t]he claims’ language is broadly written to read on various message [sic] conversion, which intended for a specific device.” *Office Action*, page 3, paragraph 7. The Examiner further stated that “Casio (WO 98/15091) also taught generating message in accordance with client limitation and user profile, which read on the claim as written.” *Id.*

The Examiner is respectfully requested to cite any such message conversion that this statement is intended to reference. As stated in MPEP § 706, “[t]he goal of examination is to clearly articulate any rejection early in the prosecution process so that the applicant has the opportunity to provide evidence of

patentability and otherwise reply completely at the earliest opportunity.” Further, 37 C.F.R. 1.104 states that “[i]n rejecting claims for want of novelty or for obviousness, the examiner must cite the best references at his or her command. When a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable. The pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified.”

Regarding *Casio*, it is submitted that it does not teach “generating message in accordance with client limitation and user profile, which read on the claim as written,” as stated by the Examiner. *Casio* discloses a “network system, a server, and a data terminal permitting supply of more complete information to diverse types of data terminals that may be less capable of receiving the information than the usual PC.” *Casio*, page 2, lines 21-25. *Casio* does not teach or suggest each of the limitations of Claims 1-4, and therefore cannot anticipate the claims under 35 U.S.C. § 102, nor render these claims obvious under 35 U.S.C. § 103.

If the Examiner wishes to cite *Casio* in rejecting the claims, it is requested that the rejection be made explicit and any relevant portions of *Casio* relied upon identified.

## **VI. CONCLUSION**

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application should be allowable, and a Notice of Allowance is requested. The Examiner is respectfully requested to telephone the undersigned before an advisory action is issued in order to avoid any unnecessary filing of an appeal.



The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

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Respectfully submitted,

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